Application No.: 09/892,367

Office Action Dated: May 16, 2006

PATENT REPLY FILED UNDER EXPEDITED PROCEDURE PURSUANT TO 37 CFR § 1.116

## REMARKS

The foregoing Amendment after Final and the following Remarks are submitted in response to the Final Office Action issued on May 16, 2006 in connection with the above-identified patent application, and are being filed within the three-month shortened statutory period set for a response by the Final Office Action.

Claims 1, 2, 9, 10, 14, 15, 19, 20, 24, 25, 29, and 30 remain pending in the present application. Independent claim 1 has been amended to further recite the present invention, and all other independent claims have been similarly amended. Applicants submit that no new matter has been added to the application by the Amendment after Final.

Applicants again request reconsideration and withdrawal of the rejection of the claims consistent with the following remarks.

The Examiner has rejected the claims under 35 USC § 103(a) as being obvious over Yoshiura (U.S. Patent No. 6,157,720) in view of Watney (U.S. Patent No. 5,930,398) and further in view of Zeng (U.S. Patent No. 6,505,299). Applicants respectfully traverse the § 103(a) rejection.

Independent claim 1 as amended recites a computer system for receiving encrypted compressed content and for producing decrypted decompressed content based on the received encrypted compressed content. In the recited system, and similar to before, a decryption element develops a content key and decrypts the content based at least in part on the developed content key, and a decompression element decompresses the content based at least in part on the content key. Notably, the decryption element supplies the content key to the decompression element. Thus, and as was previously pointed out, the content key is employed to decrypt the content and also to decompress the content. In particular, the

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decompression element has a plurality of adjustable parameters and employs the content key as at least one of the adjustable parameters. More particularly, the decompression element includes a quantizer for performing a lossy quantization step, and the quantizer is de-dithered according to the content key. In addition, the decompression element includes an internal representation that includes DCT coefficients of macroblocks, and such coefficients are descrambled and de-noised according to the content key.

As amended, claim 1 newly recites that the decryption element and the decompression element are closely physically related to one another so as to protect the content key as supplied by the decryption element to the decompression element. Such close physical relationship is achieved either by the decompression element residing in a process address space of the decryption element on the computer system, or the decryption element residing in a process address space of the decompression element on the computer system.

Independent claim 9 recites subject matter similar to that of claim 1, albeit in the form of a computer system for encrypting and compressing. Independent claim 14 recites subject matter similar to that of claim 1, albeit in the form of a method for decrypting and decompressing. Independent claim 19 recites subject matter similar to that of claim 1, albeit in the form of a method for encrypting and compressing. Independent claim 24 recites subject matter similar to that of claim 1, albeit in the form of a computer readable medium with instructions thereon for decrypting and decompressing. Finally, independent claim 29 recites subject matter similar to that of claim 1, albeit in the form of a computer readable medium with instructions for encrypting and compressing.

Thus, and as was previously pointed out, the invention as recited in the independent claims of the present application employs a content key both to encrypt / decrypt

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content and to compress / decompress the content. As a result, without the content key,

neither such encryption / decryption nor such compression / decompression may be

performed.

Thus, the present invention essentially requires that encryption / decryption

and compression / decompression be performed in a unitary manner such that both are based

at least in part on the content key. Accordingly, compressed content is essentially gibberish

to a content thief unless such content thief has the content key (KD) to be employed during

decompression of such compressed content.

As pointed out at about page 62 of the specification of the present application,

in the course of the black box 30 (i.e., the decompression element) supplying the content key

(KD) to the decompressor codec 60 (i.e., the decompression element), such delivered content

key must be protected from discovery, including discovery by the aforementioned content

thief. Accordingly, to protect the content key (KD) while delivered to and in the hands of the

decompressor codec 60, such black box 30 and codec 60 may be closely physically

associated, such as for example by having one residing in the process address space of the

other, as is now recited in the claims.

As was previously noted, the Yoshiura reference discloses a system that both

encrypts / decrypts content and compresses / decompresses the content based on a work key

116 (Fig. 1). In addition, the Watney reference discloses a quantizer, and the Zeng reference

discloses scrambling and descrambling at least some DCT coefficients according to a content

key or the like.

However, and significantly, none of the aforementioned references either

alone or combined discloses or even suggests that, to protect a content key from discovery

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while delivered to and in the hands of a decompressor or the like, the decryptor or the like and the decompressor or the like should or even could be closely physically associated, such as for example by having one residing in the process address space of the other, as is recited

in the claims. In fact, none of the aforementioned references even considers protection of the

content key to be an issue, and therefore would not suggest or even disclose protecting same.

Thus, Applicants respectfully submit that the Yoshiura, Watney, and Zeng references cannot be combined to make obvious the subject matter recited in the claims as amended. Accordingly, Applicants respectfully request reconsideration and withdrawal of

the section 103(a) rejection.

In view of the foregoing, Applicants respectfully submit that the present application including claims 1, 2, 9, 10, 14, 15, 19, 20, 24, 25, 29, and 30 is in condition for allowance, and such action is respectfully requested.

Respectfully submitted,

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